

PROPOSAL EVALUATION

Integrated Regional Water Management Implementation Proposition 50, Chapter 8 IRWM Implementation Step 1

PIN: 7144
APPLICANT NAME: County Sanitation Districts of Los Angeles County
PROJECT TITLE: Implementation of the Upper Santa Clara River Chloride TMDL
FUNDS REQUESTED: \$ 7,303,512
COST MATCH: \$ 6,447,013
TOTAL PROJECT COST: \$13,750,525

DESCRIPTION: The six projects include an expansion of existing outreach programs, focusing on educating residents about impacts of water softeners on water quality and encouraging the retirement of existing equipment, and developing a new rebate/removal program; a well-headed softening demonstration project to evaluate new technology efficacy and public acceptance; a water supply chloride contribution study to characterize and manage chloride contribution of water supplies in the watershed; a USCR groundwater-surface water interaction study that will develop and utilize a model to evaluate the feasibility of management strategies to meet future wasteload allocation for chloride; an expansion of CLWA's existing recycled water system; and implementation of measures to restore groundwater production capacity and prevent contamination of Saugus Formation groundwater.

Question: Consistency with Minimum IRWM Standards - This evaluation will focus on whether the applicant has demonstrated that the IRWM Plan meets the minimum standards.

Fail

Question: Consistency with IRWM Standards - Adopted IRWM Plan and Proof of Formal Adoption. Weighting factor is 1

The three agencies involved in the application are the applicant, the Castaic Lake Water Agency (CLWA); and the Valencia Water District (VWD). The three documents said to comprise the FED are: the Chloride TMDL Plan adopted by the Los Angeles RWB in July 2002; the CLWA 2000 UWMP; and the Santa Clara River Valley Groundwater Basin, East Subbasin GWMP. However, the RWB's TMDL does not constitute a plan, but rather a set of waste load allocations that stakeholders use in their planning efforts for improving water quality, and the collection of documents do not meet the IRWMP Minimum Standards. There is no schedule to adopt an IRWMP by January 1, 2007.

Question: Consistency with IRWM Standards - Description of Region. Weighting factor is 1

The applicant provides a description of the region, but the description does not fully address the criteria. The region is described separately, in the three documents making up the FED, but never as a comprehensive unit. There are few references made to the FED made up of three documents including the TMDL, which then refers to sections with a brief reference to the topic. No details are provided. For example, the applicant refers to the TMDL when describing groundwater quality and quantity, but the referenced sections do not provide any useful information regarding this topic. Ecological processes, socio-cultural make-up, economic conditions, and important trends in the region are not described in sufficient detail. The description does not address the current and future high growth rates in the region and the pressures that this may put on water and other natural resources.

Question: Consistency with IRWM Standards - Objectives. Weighting factor is 1

Although the objectives are presented in Attachment 5, none are apparent in the actual documents. The four stated objectives refer to developing a plan to implement the TMDL. That plan does not address the entire TMDL and the proposed projects will only address four of the tasks in the TMDL Plan. There is no description of how these objectives were determined or how they relate to other regional priorities. Objectives related to the UWMP and GWMP are described in general terms and are not well articulated. One objective mentions implementing the FED while considering the impacts on the ecosystem, but no mention of environmentally sensitive areas are found in the FED and none of the proposed projects address this priority.

Question: Consistency with IRWM Standards - Water Management Strategies and Integration. Weighting factor is 1

The applicant states that all strategies that were presented in the Guidelines were considered. Applicant does not state how the final strategies were determined. Additional supporting text would have been helpful since the documents were drafted prior to Guidelines. There is no discussion of why specific strategies are not applicable. It is not clearly indicated how the strategies work together to provide multiple benefits and achieve the objectives. The only mention of management strategies within the FED is in a section devoted to another topic.

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Question: Consistency with IRWM Standards - Priorities and Schedule. Weighting factor is 1

The applicant provides a small table in Attachment 4 showing the project priorities, which indicate that, the successful implementation of the TMDL Plan is the main priority of the FED. The collaborative process referred to in the proposal does not include all of the named participating agencies and it is associated specifically with the TMDL Plan. The method used for prioritizing is not indicated except that the projects are identified in the TMDL Plan. No other regional priorities are mentioned. Neither the FED nor Attachment 5 discuss how: 1) decision making will be responsive to regional changes; 2) responses to implementation of projects will be assessed; and 3) project sequencing may be altered based on implementation responses.

Question: Consistency with IRWM Standards - Implementation. Weighting factor is 1

The FED does not address specific projects, plans, or studies that will aid in the implementation of the FED. Attachment 5 refers to 4 of the 10 TMDL Plan tasks. The applicant does not present the responsible entities for any project other than Project No. 1, which will be implemented by the applicant, the City of Santa Clarita, and USACE. Each project was discussed separately and the linkages between projects are not clearly identified. The economic and technical feasibility of projects is not demonstrated. Attachment 5 discusses the status of the six proposed projects. The institutional structure that will ensure implementation is not clearly discussed or referenced.

Question: Consistency with IRWM Standards - Impacts and Regional Benefits. Weighting factor is 1

There is no specific discussion about the impacts and benefits to the region. The sections referenced do not contain any comments directed at this topic. The FED does not include an evaluation of potential negative impacts from its implementation within the region or to adjacent areas. Attachment 5 suggests that the UWMP, Section 1.2C, talks about impacts to the region and State, but no information regarding this topic is in that section. In addition, the FED does not include the advantages of a regional plan as opposed to individual local efforts.

Question: Consistency with IRWM Standards - Technical Analysis and Plan Performance. Weighting factor is 1

Although the applicant refers to sections in the TMDL Plan, this criterion is not at all addressed. Section 2.3 and Appendix 2 describe some of the statistics and analyses that were used to design the TMDL, but none are relative to the specific tasks and projects within the proposal. Section 2.6.5 explains that additional monitoring should be conducted to "verify the effectiveness of the TMDL remedy" and nothing more specific is stated regarding future analysis and plan assessment. The applicant does not discuss measures that will be used to evaluate projects/plan performance; monitoring systems that will be used to gather performance data; and mechanisms to adapt project operation and plan implementation based on performance data collected. Data gaps are not clearly identified.

Question: Consistency with IRWM Standards - Data Management. Weighting factor is 1

The FED does not include specific mechanisms by which data will be managed and disseminated to stakeholders and the public. Attachment 5 briefly mentions that data will be made available in reports, appendices, and electronic versions from applicant and the RWB. The FED does not assess the state of existing monitoring efforts for either water supply or water quality. There is no mention of SWAMP or statewide data needs in Attachment 5 or the FED.

Question: Consistency with IRWM Standards - Financing. Weighting factor is 1

Attachment 5 contains a discussion of financing related to the TMDL and specifically cites a project management plan and feasibility cost sharing agreement between the applicant, the City of Santa Clarita, and USACE. These documents are not final and the applicant anticipates presenting these in the Step 2 application. The brief discussion of financing in Attachment 5 does not include enough detail to properly evaluate the financing plan.

Question: Consistency with IRWM Standards - Relation to Local Planning & Sustainability. Weighting factor is 1

The applicant barely addresses any local planning documents other than the UWMP and GWMP included in the application. The applicant fails to include important regional documents like the "Standard Urban Stormwater Mitigation Plan" or the "MS4 Stormwater Management Plan." The FED contains no discussion about how the UWMP and the GWMP are related to each other or to the TMDL. It is also unclear how the proposal incorporates these plans into the tasks and projects. The FED does not discuss the dynamics between the two levels of planning documents. This FED needed to include some form of a summary document that would tie all three documents together and relate them to regional goals.

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Question: Consistency with IRWM Standards -Stakeholder Involvement & Coordination. Weighting factor is 1

The applicant fails to include stakeholders in the region in an IRWM planning process. The application refers to the stakeholder involvement in the TMDL process as proof of stakeholder involvement in the IRWM planning process, but one is not a substitute for the other. The current list of stakeholders is incomplete. It includes most of the water districts in the area, but fails to include the local downstream growers as well as the Santa Clarita Organization for Planning the Environment, Newhall County Water District, Friends of the Santa Clara River, etc. DACs and environmental justice concerns are not discussed. Obstacles to plan implementation and coordination with State and federal agencies are not discussed.

Question: Funding Match. This evaluation will focus on whether the applicant has demonstrated the ability to meet the minimum funding match or has requested a waiver or reduction in the funding match.

Question: Description of Proposal. Weighting factor is 3

Although the applicant includes a brief description of each of the projects in the proposal, more specific information is needed. The goals and objectives of the proposal are not clearly identified. The applicant does not discuss how the proposal is consistent with the FED or how it relates to the FED other than implementing TMDL tasks. The proposal does include a description of the relevant water body for the TMDL and its beneficial uses, water quality problems, and consistency with the applicable RWB Watershed Management Initiative plans. The applicant does not discuss the integration of the proposal with other grant funded projects; how the proposal provides source water protection for the region; or the metrics that will be used to show measurable water quality or water supply improvements

Question: Project Prioritization. Weighting factor is 2

This topic is inadequately addressed in both the proposal and the FED. The applicant does not discuss any regional priorities other than implementing the TMDL. There are no priorities specified within the region, the FED, or this proposal. The application provides a prioritization of the projects within the proposal itself, although it is very general. The projects are grouped into short- and long-term priorities, but there is insufficient description of the criteria used to divide the six projects into the two groups.

Question: Cost Estimate. Weighting factor is 1

The applicant does not provide a clear and reasonable estimate of costs for each project contained in the proposal. More narrative details about the various categories in each project are needed. For example, Project 1 includes the development of a groundwater-surface water interaction model, at a cost of over \$3.6 million. No description of this task is provided to explain the need for such a large amount of funds. Many of the estimates for each project do not show land costs, planning and design costs, or construction/implementation costs. The applicant appears to have adequate match funding. It is worth noting here that for Project 3, the applicant indicates that the \$300,000 funding match contribution is considered to have already been expended in the last three years of the existing outreach program.

Question: Schedule. Weighting factor is 1

The applicant provides individual schedules for each project showing the sequence and timing of the implementation of the project. Although this proposal only addresses four of the tasks outlined in the TMDL Plan, the applicant does provide a brief illustration of how the other related elements (non-proposed tasks) of the FED would be completed on schedule. There are no specifics provided as they simply display each task from the TMDL Plan with a start and finish date. It would have been helpful and informative to see how the various components of the non-proposed tasks/projects would overlap with the current proposal.

Question: Need. Weighting factor is 2

The applicant provides a brief description of how the proposal and the projects are needed to implement the TMDL. They review the expected long-term regional water management needs, specifically reducing the dependence on imported water and improving the local water supply. They describe how the proposal would help meet that need, although more details would help. The need for this proposal is addressed separately for each project, which mostly relates to the TMDL. The applicant fails to discuss the local and regional economic, environmental, and fiscal impacts. Potential critical negative impacts of not completing the projects are discussed for only two of the six projects proposed.

Question: Disadvantaged Communities. Weighting factor is 2

No Attachment 10 is included in the application. There is no discussion of DACs in any part of the application.

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Question: Program Preferences. Weighting factor is 1

Program preferences are not properly addressed in the application. These projects are not integrated amongst themselves although they all contribute expeditiously and measurably to the long-term attainment and maintenance of water quality standards within this region. A few of these projects may potentially eliminate or significantly reduce pollution in impaired waters and sensitive habitat areas, but as most of these projects are studies that don't include an implementation stage. There are no projects to improve water quality or drinking water for DACs.

TOTAL SCORE: DISQUALIFIED